

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**TYHEE HICKMAN, SHANAY BOLDEN,  
and O'DONALD HENRY, individually and  
on behalf of all persons similarly situated,**

**Plaintiffs,**

**v.**

**TL TRANSPORTATION, LLC, SCOTT  
FOREMAN, HERSCHEL LOWE,  
AMAZON.COM, LLC, and AMAZON  
LOGISTICS, INC.,**

**Defendants.**

**Civil Action No.: 2:17-cv-01038-GAM**

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF THE SETTLEMENT AGREEMENT**

Plaintiffs Tyhee Hickman, Shanay Bolden, and O'Donald Henry, through their undersigned counsel, respectfully move this Court for an Order:

1. Granting preliminary approval of the Parties' Settlement Agreement, a true and correct copy of which is attached as Exhibit 1 to this Motion;
2. Granting approval to the terms and conditions contained in the Settlement Agreement as a fair and reasonable resolution of a *bona fide* dispute under the Fair Labor Standards Act;
3. For settlement purposes, confirming the Court's July 13, 2018 Order conditionally certifying the Settlement Class as a collective pursuant to 29 U.S.C. § 216(b), pending final approval of the settlement:

All current and former Delivery Associates who were employed by TL Transportation, LLC to deliver packages to Amazon customers in the United States between March 8, 2014 and April 15, 2017;

4. For settlement purposes, the preliminarily certifying the Settlement Class pursuant to Fed. R. Civ. P. 23, pending final approval of the settlement as follows:

all current and former Delivery Associates who were employed by TL Transportation, LLC to deliver packages to Amazon customers in Pennsylvania, Maryland and New Jersey between March 8, 2014 and April 15, 2017;

5. Preliminarily approving Plaintiffs Tyhee Hickman, Shanay Bolden, and O'Donald Henry as the Representatives of the Settlement Class;

6. Preliminarily approving Berger Montague PC and Willig, Williams, & Davidson as Class Counsel for the Settlement Class;

7. Preliminarily approving Angeion Group as Settlement Administrator preliminarily approving the costs of settlement administration;

8. Approving the Notice of Settlement, attached as Exhibit A to the Settlement Agreement, and authorizing dissemination of the Notice to members of the Settlement Class; and

9. Approving the proposed schedule and procedure for completing the final approval process as set forth in the Parties' Settlement Agreement and setting a date and time for the final approval hearing.

This Motion is based on the accompanying Memorandum of Law, the Declaration of Sarah Schalman-Bergen in Support of the Plaintiffs' Unopposed Motion for Preliminary Approval of the Settlement Agreement, the attached Exhibits, and all other records, pleadings and papers on file in this action. Defendants do not oppose this Motion. A proposed Order is submitted for the Court's consideration.

Dated: September 18, 2019

Respectfully Submitted,

BERGER MONTAGUE PC

/s/ Sarah R. Schalman-Bergen

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*Attorneys for Plaintiffs and the Settlement  
Class*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing has been filed on the ECF docket and is available for viewing and download on this 18th day of September, 2019.

s/ Sarah R. Schalman-Bergen  
Sarah R. Schalman-Bergen